



GOTTLIEB,
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INTELLECTUAL PROPERTY LAW

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Marc P. Misthal
Principal
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June 8, 2021

1. Time to respond to the Complaint extended
to July 13, 2021.

VIA ECF

The Honorable John G. Koeltl
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

2. June 14, 2021 Conference
adjourned to August 9, 2021 at 3³⁰ P.M.
so ordered. JRG/6/8/21/US.D.S.

Re: Business Casual Holdings, LLC v. TV-Novosti, 21-CV-2007-JGK

6/8/21

Dear Judge Koeltl:

Our office represents Defendant TV-Novosti in connection with the above matter, together with Laina Lopez, Esq. of Berliner Corcoran & Rowe LLP, who intends to submit a motion for admission *pro hac vice* as soon as possible.

TV-Novosti was served on June 2, 2021. TV-Novosti therefore respectfully requests that the Court grant it twenty (20) additional days, or until July 13, 2021, to respond to the Amended Complaint. On June 7, 2021, we asked counsel for Plaintiff Business Casual Holdings, LLC if Plaintiff would consent to this request; as of the filing of this letter, we have not received a response.

Additionally, TV-Novosti respectfully requests that the Court adjourn, *sine die*, the conference currently scheduled for June 14, 2021 at 12:00 p.m. An adjournment will allow the Court time to consider and address, as necessary, the Related Case Statement (Dkt. 15) in which we brought to the Court's attention a related, subsequent case filed with this Court by Plaintiff: *Business Casual Holdings, LLC v. YouTube, et al.*, 21-cv-03610-ER. An adjournment will also allow the parties to have a more meaningful conference with the Court at such time as TV-Novosti will have responded to the Amended Complaint. No prior request for an adjournment



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of this conference has been made. On June 7, 2021, we asked Plaintiff's counsel if Plaintiff would consent to an adjournment of the June 14 conference; as of the filing of this letter we have not received a response.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

GOTTlieb, RACKMAN & REISMAN, P.C.

A handwritten signature in black ink that reads 'Marc P. Misthal'. The signature is written in a cursive, flowing style.

Marc P. Misthal

MPM

cc: Laina Lopez, Esq.
Shane Wax, Esq.
Anderson Duff, Esq. (via ECF)